

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Roanoke Division

BAE SYSTEMS ORDNANCE)
SYSTEMS, INC.)
Plaintiff,)
v.)
FLUOR FEDERAL SOLUTIONS, LLC)
Defendant.)

)

Civil Action No. 7:20-CV-00587-MFU-RSB

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE RULE 26(f) REPORT**

Fluor Federal Solutions, LLC and BAE Systems Ordnance Systems, Inc. (collectively, the “Parties”), by counsel, jointly move this Court to extend the deadline for filing a Rule 26(f) report to August 13, 2021. Good cause exists for this extension, as set forth below.

1. On July 12, 2021, this Court issued its Scheduling Order in the captioned matter (ECF 48).
2. The Scheduling Order directed the Parties to hold a Rule 26(f) conference on or before July 26, 2021.
3. The Parties conducted a Rule 26(f) conference on July 23, 2021.
4. The Scheduling Order further requires that the Parties submit a Rule 26(f) report (the “Report”) on or before August 2, 2021, which is 21 days from the entry of the Order.
5. Counsel for the Parties have conferred and agreed to extend the deadline for filing the Report to August 13, 2021, which will be reflected in the Rule 26(f) Report.
6. Good cause exists for the requested extension because the Rule 26(f) report is intended to reflect the Parties’ mutual understanding of the scope of discovery; this extension will afford the

Parties the necessary, additional time to negotiate and agree upon the contents of the Report.

For the foregoing reasons, the Parties jointly request that this Court extend the deadline for filing a Rule 26(f) report up to and including August 13, 2021.

Dated: August 2, 2021

Respectfully submitted,

/s/ Gregory M. Wagner

Scott P. Fitzsimmons, Esq. (VSB 68147)
Kathleen O. Barnes, Esq. (VSB 30451)
Edward J. Parrott, Esq. (VSB 29499)
Gregory M. Wagner, Esq. (VSB 96017)
WATT, TIEDER, HOFFAR
& FITZGERALD, LLP
1765 Greensboro Station Place, Suite 1000
McLean, Virginia 22102
Tel: (703) 749-1000
Fax: (703) 893-8029
sfitzsimmons@watttieder.com
kbarnes@watttieder.com
eparrott@watttieder.com
gwagner@watttieder.com

Attorneys for Fluor Federal Solutions, LLC

/s/Justin E. Simmons

Joshua R. Treece (VSB No. 79149)
jtreece@woodsrogers.com
Justin E. Simmons (VSB No. 77319)
jsimmons@woodsrogers.com
WOODS ROGERS PLC
10 South Jefferson Street, Suite 1800
Roanoke, Virginia 24011
Telephone: (540) 983-7600
Facsimile: (540) 983-7711

Karen M. Stemland (VSB No. 47167)
WOODS ROGERS PLC
123 East Main Street, 5th Floor
Charlottesville, Virginia 22902
Telephone: (434) 220-6826
Facsimile: 434-566-0473
kstemland@woodsrogers.com

-and-

Todd M. Conley (VSB #89839)
Jeffrey J. Golimowski (VSB #93525)
WOMBLE BOND DICKINSON (US) LLP
8350 Broad Street, Suite 1500
Tysons, VA 22102
Telephone: (703) 394-2245
todd.conley@wbd-us.com
jeff.golimowski@wbd-us.com

*Attorneys for BAE Systems Ordnance Systems,
Inc.*